

FILED-5

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION 18 JAN 16 PM 2:02

JOYCE WILLIAMS,

Plaintiff,

vs.

WAL-MART STORES, INC., a

Delaware Corporation, d/b/a

WAL-MART 5486 SUPERCENTER,

Defendant.

No: _____

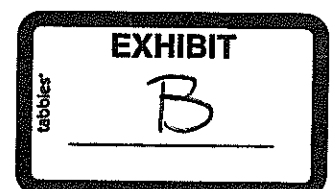
DOROTHY BROWN
CLERK OF CIRCUIT COURT
LAW DIVISION

20181000526
CALENDAR/ROOM A
TIME 00:00
Premises Liability

COMPLAINT AT LAW

NOW COMES the Plaintiff, JOYCE WILLIAMS, by her attorneys, ANKIN LAW OFFICE LLC, and complaining of the Defendant, WAL-MART STORES, INC., a Delaware Corporation, d/b/a WAL-MART 5486 SUPERCENTER (hereinafter referred to as "WAL-MART"), states as follows:

1. On and prior to March 2, 2016, WAL-MART was a Delaware Corporation in good standing with the Illinois Secretary of State and performing business in the State of Illinois.
2. On and prior to March 2, 2016, the Plaintiff, JOYCE WILLIAMS, was a resident of the County of Cook and State of Illinois.
3. On or about March 2, 2016, and for a long time prior thereto, the Defendant, WAL-MART, owned and/or maintained or had a duty to maintain, both individually and by and/or through its agents, servants and/or employees, its premises at WAL-MART 5486 SUPERCENTER located at 4005 167th Street, in the City of Country Club Hills, County of Cook, State of Illinois.



4. That on March 2, 2016 at approximately 6:00 p.m., Plaintiff, **JOYCE WILLIAMS**, was lawfully on said premises at WAL-MART 5486 SUPERCENTER located at 4005 167th Street, in the City of Country Club Hills, County of Cook, State of Illinois.

5. That on and prior to March 2, 2016, Defendant, **WAL-MART**, had a duty to keep its premises safe for those lawfully on the premises to include Plaintiff herein, **JOYCE WILLIAMS**.

6. Notwithstanding its duty, Defendant, **WAL-MART**, by and through its agents, servants and/or employees, allowed a tripping hazard in the form of a pallet, shelf, and/or rack to exist in an area frequently used by those lawfully on said premises for an unreasonable period of time and thus created a dangerous condition and as a result the Plaintiff, **JOYCE WILLIAMS**, fell and injured herself.

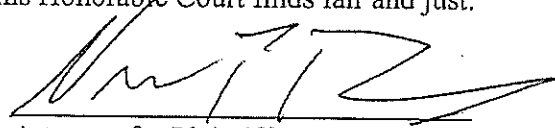
7. At the aforesaid time and place, the Defendant, **WAL-MART**, as the owner and/or maintainer of the aforementioned premises, either individually or by and through its agents, servants and/or employees acted with less than reasonable care and was then and there guilty of one or more of the following careless and negligent acts and/or omissions:

- a. Improperly operated, managed, maintained and controlled its premises in allowing its pallet, shelf and/or rack to remain in a dangerous and poor condition;
- b. Failed to warn the Plaintiff and other persons lawfully on said premises of the dangerous condition when Defendants knew or should have known in the exercise of ordinary care that said warning was necessary to prevent injury to the Plaintiff;
- c. Failed to make a reasonable inspection of its premises when it knew or in the exercise of ordinary care should have known that said inspection was necessary to prevent injury to the Plaintiff and others lawfully on said premises;

- d. Failed to clean, pick up, or otherwise correct a tripping/falling hazard on its premises;
- e. Failed to provide adequate safeguards to prevent Plaintiff from injury while Plaintiff was lawfully upon said premises; and
- f. Was otherwise negligent in failing to keep its premises safe.

8. As a direct and proximate result of one or more of the foregoing negligent acts or omissions of Defendant, **WAL-MART**, Plaintiff, **JOYCE WILLIAMS**, sustained serious and permanent injuries when she fell on said premises due to the negligence of Defendant, **WAL-MART**; was required to seek extensive medical consultation and treatment; has expended, and will in the future expend, great sums of money to be healed and cured of her maladies; suffered, and will in the future continue to suffer, great pain, anguish, physical and mental suffering; and was deprived of earnings to which she would have otherwise been entitled.

WHEREFORE, Plaintiff, **JOYCE WILLIAMS**, prays for judgment against the Defendant, **WAL-MART STORES INC.**, a Delaware Corporation, d/b/a **WAL-MART 5486 SUPERCENTER** in such an amount in excess of this Court's jurisdictional requisite as will fairly and adequately compensate Plaintiff for her injuries, losses and damages as herein above alleged, costs of suit, and any further relief which this Honorable Court finds fair and just.



Attorney for Plaintiff

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JOYCE WILLIAMS,

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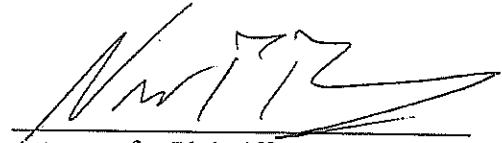
WAL-MART STORES, INC., a
Delaware Corporation, d/b/a
WAL-MART STORE #4005,

Defendant.

RULE 222(B) AFFIDAVIT

I, NICHOLAS P. DRURY, being first duly sworn on oath, depose and state that the amount of damages sought in the above-captioned cause of action exceeds \$50,000.00 for Plaintiff.

By:


Attorney for Plaintiff

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